

FILED
HARRISBURG, PA

JUN 27 2025

PER

DEPUTY CLERK

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Maryann Butler and Petie Davis,

Plaintiffs,

v.

New American Funding (Broker Solutions Inc.),

Defendant.

Case No. 1:25-cv-690-PJC

JUDICIAL NOTICE OF STRATEGIC DELAY

NOW COMES Petie Davis, appearing pro se and as Authorized Representative of Plaintiff Maryann Butler, and respectfully submits this Judicial Notice of Strategic Delay to call the Court's attention to recent procedural actions which appear to be taken solely for delay and tactical avoidance of liability.

1. On June 24, 2025, Defendant's counsel filed a generic motion to extend their response deadline to Plaintiffs' filings (ECF No. 24), stating only that they seek to "evaluate the amended complaint" — despite full awareness of the claims and record.
2. Counsel did not challenge the merits of any pending filings nor did they dispute the factual allegations on record, which include clear evidence of misconduct, misrepresentation, and violation of federal lending protocol.
3. The extension request follows a series of tactical maneuvers by Defendant to delay proceedings, evade early discovery, and withhold accountability, even as Plaintiffs presented overwhelming evidence of impropriety.
4. As of this filing, no meaningful response has been offered to numerous verified exhibits and declarations establishing that Defendant:

- Blocked access to communications with the loan officer.
 - Sent sensitive loan documents off-portal.
 - Falsely represented the loan file to regulators.
 - Created a paper trail of consumer harm, delay, and bad faith.
5. The requested extension serves no purpose other than to delay inevitable judicial scrutiny and undermine the pace of justice for Plaintiffs experiencing active financial harm and emotional distress.

WHEREFORE, Plaintiffs respectfully notify this Court of the strategic nature of Defendant's delay and urge the Court to closely scrutinize further requests for extension or vague procedural posturing. Plaintiffs reserve the right to seek sanctions or expedited remedies if these tactics persist.

Respectfully submitted,

Petie Davis

Plaintiff and Authorized Representative

Date: June 25, 2025

VERIFICATION

I, Petie Davis, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on this 25th day of June, 2025.

Petie Davis

2041 Greenwood Street

Harrisburg, PA 17104

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of June, 2025, I served a true and correct copy of the foregoing Judicial Notice of Strategic Delay via email to:

James McNally

Cohen Seglias Pallas Greenhall & Furman PC

Email: jmcnally@cohenseglias.com

Respectfully,

Petie Davis

Pro Se Litigant and Authorized Representative

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